



## HART MCLAUGHLIN & ELDRIDGE

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September 26, 2018

**VIA CERTIFIED MAIL**

Environmental Protection Agency  
77 West Jackson Boulevard  
Chicago, IL 60604-3507  
r5foia@epa.gov

Re: *Ryan Feeney v. Sterigenics International, Inc., et. al.*

**Freedom of Information Act Request**

Dear Sir or Madam:

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, and on behalf of all our clients, the citizens of Willowbrook, Burr Ridge and Darien, Illinois, including Ryan Feeney, the following documents and information are requested associated with Sterigenics International, Inc. ("Sterigenics"), located at both at 7775 S. Quincy St., and 830 Midway Drive, Willowbrook, Illinois 60527, and (1) the Agency for Toxic Substances and Disease Registry's ("ATSDR") August 21, 2018 report entitled "*Evaluation of Potential Health Impacts from Ethylene Oxide Emissions*," and (2) the U.S. EPA's 2014 National Air Toxics Assessment ("NATA") concerning ethylene oxide emissions.

Those documents include, but are not limited to:

- All records documenting Sterigenic's use, purchase and emissions of EtO since 1984;
- All reports or studies regarding EtO emissions in Willowbrook and its surrounding areas since 1984, including those excluded from the ATSDR evaluation and the 2014 NATA report;
- All complaints made by current and former employees, local residents or any governmental agency regarding Sterigenic's EtO emissions since 1984;
- All correspondence between the EPA and Sterigenics approving Sterigenic's siting in Willowbrook;
- All correspondence or documents permitting Sterigenic's EtO emissions since 1984;

- All National Emission Inventory (NEI) information on EtO emissions filed by Sterigenics that were referred to in the 2014 NATA report;
- Any Environmental Impact Statement (EIS) filings, pursuant to 40 CFR 1506.9 and 1506.10, made by Sterigenics since 1984;
- Any correspondence by the EPA to Sterigenics, including, but not limited to, any advisement of safer alternatives than EtO;
- All modeling performed, and the bases for the emissions estimated, by the EPA to evaluate the short-term and long-term concentrations of EtO in the air surrounding the Sterigenics facilities;
- All Toxic Release Inventory (TRI) information on EtO emissions filed by Sterigenics since 1984;
- All Quality Assurance Plans (QAPs) regarding Sterigenic's Willowbrook facilities since 1984;
- All Prevention of Significant Deterioration (PSD) reports permitting Sterigenic's emission of EtO in Willowbrook since 1984;
- Any BACT limitations imposed on Sterigenics since 1984;
- All Air Quality Analyses or monitoring performed around the Sterigenics Willowbrook facility since 1984 and their results;
- All tests, studies or investigations performed by the EPA's National Pollutant Discharge Elimination System into Sterigenics since 1984;
- All sanctions or fines imposed on Sterigenic's Willowbrook facility since 1984;
- All correspondence that the EPA has had with the ATSDR concerning its decision to perform air monitoring, which occurred on May 16-18, 2018, around Sterigenic's Willowbrook facility;
- All sample results, with corresponding locations, from May 16-18, 2018, air monitoring performed around the Sterigenics Willowbrook facility including those sampling results, with corresponding locations, excluded from the ATSDR evaluation;
- All lab reports for the samples collected during U.S. EPA's air monitoring conducted around the Sterigenics Willowbrook facility on May 16-18, 2018; including all QA/QC sample results;
- All documents in possession of the EPA regarding the Illinois Attorney General's 2015 complaint against Sterigenics for several environmental violations, including water and air pollution;
- All documents pertaining to the EPA's testing protocol and methodology for EtO emissions; and
- All sample results and reports from the September 20-21, 2018 testing performed by Sterigenics in which the EPA was present.

At this time, I am also requesting a waiver of all fees for this request. Disclosure of the requested information is a public interest that is likely to contribute significantly to public understanding of the studies, regulations, and standards of the government regarding Sterigenic's EtO emissions. Our request is not a commercial interest. Mr. Feeney is but one of many Willowbrook, Burr Ridge, Darien, and other surrounding

area residents who have been exposed to Sterigenic's EtO emissions for decades and now suffers from cancer. This information will shed light as to when Sterigenics began violating the trust of the people living near its Willowbrook facilities by disregarding regulations, standards, and studies that showed the human consequences of EtO exposure. For these reasons, we also insist that our FOIA Request be expedited, for the sake and well-being of these families who deserve the truth.

I trust that you will give this matter your prompt attention. Thank you in advance for your cooperation.

Very truly yours,

HART MCLAUGHLIN & ELDRIDGE, LLC

*Steven A. Hart*

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